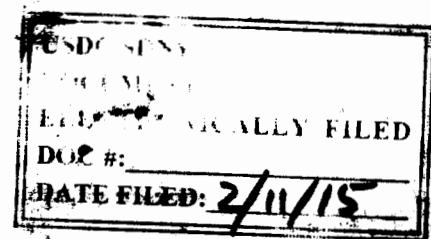


**ROBERT J. MCGUIRE, ESQ.  
ADMINISTRATOR, LOCAL 1588 (ILA)  
415 MADISON AVENUE, 11<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10017  
TELEPHONE (212) 817-6734  
FACSIMILE (212) 817-6736**

January 30, 2015

Honorable Alvin K. Hellerstein  
United States District Judge  
United States Courthouse  
Southern District of New York  
500 Pearl Street, Room 910  
New York, New York 10007



**RE: United States v. Local 1804-1, et al. 90 Civ. 0963**

Dear Judge Hellerstein:

Pursuant to paragraph 6 (Compensation and Expenses) and paragraph 3(f) (Hiring Authority) of the Court Order relating to Local 1588 of the International Longshoremen's Association, I respectfully submit an invoice for Robert C. Stewart covering the months of September through October 2014.

In accordance with the Court's earlier directions, the enclosed invoice was sent to Robert Fagella, Counsel for Local 1588, on January 12, 2015 requesting that any objections he might have be forwarded to me within two weeks. In a letter dated January 30, 2015 Mr. Fagella has advised me that the Local has no objection to the invoice submitted.

Very truly yours,

Robert J. McGuire

Enclosures

cc: AUSA Benjamin Torrance  
Deputy Administrator R. C. Stewart  
Robert A. Fagella, Esq.

**ROBERT C. STEWART**

Deputy Administrator • Local 1588 (ILA)  
220 Saint Paul Street • Westfield, NJ 07090  
Tel. 908-928-1100 • [stewcons@msn.com](mailto:stewcons@msn.com)

January 7, 2015

Robert J. McGuire, Esq.  
Administrator, Local 1588 (ILA)  
415 Madison Avenue (11th Floor)  
New York, NY 10017  
(Tel. 212-817-6734, Fax: 212-817-6736)

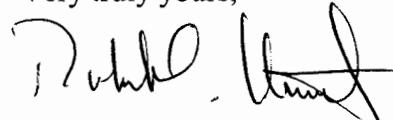
Re: Local 1588 Invoice: September and October, 2014

Dear Administrator McGuire:

Attached is my invoice for professional services provided at your direction in the above-referenced matter during the period specified above.

Thank you for your attention to this invoice.

Very truly yours,



Robert C. Stewart

Please remit to:

Stewart Consulting LLC  
220 St. Paul Street  
Westfield, NJ 07090

(EIN 22-3719636)

**INVOICE**

<u>Date</u>	<u>Hours</u>	<u>Description of Services and Expenses</u>
09/03/14	04.50	Refine questions on criteria issue (7 pages) and further research on framing the questions.
09/04/14	05.75	Travel to Manhattan for meeting with the AUSAs, Administrator, J. Mollen and the attorneys for the ILA and LU-1588 re criteria, and on other matters with the AUSA and Administrator.
09/05/14	N/C	Call from a member about certain details relating to an issue under examination; call from and discussion with JS (WFC) re several pending issues.
09/08/14	01.00	Discussion with a member about certain issues facing the local union; draft a request for information to JS (WFC) about a matter being examined.
09/11/14	N/C	Review Fagella's proposal for modifying the criteria, and draft an email to the AUSAs and the Administrator on that matter.
09/20/14	02.50	Review the AUSA's redraft of criteria and draft comments and suggestions.
09/22/14	N/C	Review a proposed revised criteria from the AUSA and begin drafting a document on another pending issue.
09/23/14	02.00	Review Part One of a draft document with JS (WFC); begin re-working certain documents in light of additional information provided; draft and email an additional document request to JS (WFC).
09/24/14	05.25	Work through and analyze the additional documents provide by the WFC; work on refining the information as necessary for the intended purpose.
09/25/14	07.50	Finish reviewing the additional material from JS (WFC) and integrate it with existing material; work on drafting several different documents as necessary; email additional requests to JS (WFC); attend a union meeting in Bayonne.

09/26/14      04.50 Work through certain new materials provided, integrate the information into existing documents; begin to run-down necessary supporting information; reorganize certain materials as necessary for the particular purpose; receive additional information in response to one of three requests for clarification – all relating to a single pending issue.

09/28/14      N/C Call back from a warehouse members with information about a pending issue; write up the information.

10/01/14      04.50 Continue working through the several documents and analyzing information obtained from different sources; interview a member on the latest issue; calls to several other members seeking clarification.

10/10/14      03.75 Return call from a member re various questions on Flagella's list of exceptions to the proposed criteria; draft an email response to the AUSAs.

10/12/14      02.25 Review Fagella's "additional provisions" and draft objections, explanations, corrections, modifications and suggestions for the AUSAs..

10/13/2014      03.50 Resume analysis of additional materials provided by the WFC on one pending issue; draft additional email requests. Further work on several documents.

10/14/14      03.00 Continue – same as above.

10/15/14      04.50 Continue as above; and draft a response to the AUSA's inquiry; draft an additional request to JS (WFC); draft a response to the AUSA's request for clarifying language vis-a-vis Fagella's objections to certain of the proposed language in the criteria.

10/16/14      11.00 Resume drafting a master document re an issue under examination; draft more email requests for information to the WFC; finish the first draft of one document on one of the two main issues under examination.

10/17/14      10.00 Continue drafting on the matter above; send and receive multiple emails from the WFC requesting and receiving clarification; finalize one documents for WFC review.

10/18/14      04.50 Draft additional requests to the WFC in regard to the master document from them as necessary for the particular purpose as discussed with the AUSAs. .

10/19/14      03.00 Revise the draft letter and email to the WFC.

10/20/14	01.50	Draft suggestions to JS (WFC) re his document.
10/21/14	01.00	Calls to several members re questions on vetting for the stewards elections and for information on other pending issues.
10/23/14	01.50	Draft emails to Brenda requesting certain information; process her responses and make additions and corrections to the documents being drafted.
10/26/14	01.25	Calls to several members on different issues; draft eligibility letter to the Administrator on the stewards elections at PA.
10/28/14	01.75	Draft an email response to JS (WFC); begin drafting further changes and finalizing the one document.
10/29/14	N/C	Continue drafting revisions.
10/30/14	05.75	Revise and redraft part two of the document; return call from a member regarding information on an outstanding issue.

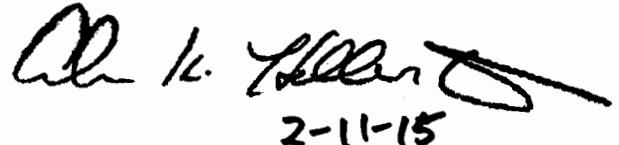
\* \* \*

95.75 hours at \$175/hr. (RCS) .....	\$ 16,756.25
Expense: .....	- N/C -

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<b>TOTAL DUE</b> .....	<b>\$ 16,756.25</b>
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Without objection,  
this invoice is approved  
for payment.  
So ordered.



2-11-15